

September 8, 2017

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42

Dear Ms. Dortch:

On September 6, 2017, Issa Asad, Chief Executive Officer, Q-Link Wireless, LLC (“Q-Link”), met separately with Jay Schwarz, Wireline Advisor to the Chairman, Claude Aiken, Wireline Legal Advisor to Commissioner Clyburn, Travis Litman, Legal Advisor to Commissioner Rosenworcel, and Trent Harkrader, Associate Bureau Chief, Wireline Competition Bureau (“WCB”), Ryan Palmer, Chief, and Allison Baker, of the Telecommunications Access Policy Division, WCB (all collectively, “FCC attendees”) regarding the above-referenced proceeding. Specifically, we discussed USAC’s recently announced plans for implementing the National Verifier, and the ways in which that will harm consumers, unnecessarily increase administrative costs for USAC, and disrupt automated enrollment processes. We distributed the attached documents, which outline solutions that will simplify the enrollment process for consumers, ensure that consumers receive required reduced USAC administrative costs as compared with its existing plans, and strengthen protections against fraud and abuse beyond USAC’s current National Verifier design.<sup>1</sup> While Q-Link cannot precisely estimate the time it would take to implement these solutions because it lacks access to USAC’s National Verifier code, based on its own substantial experience developing software to verify applicant identity and eligibility, Q-Link believes that these solutions would not add significant development and testing time, which could potentially occur alongside other activities or even during soft launch.

As discussed in our ex parte letter of August 10, 2017, Q-Link has worked hard to develop a highly automated enrollment process that has been uniquely successful in avoiding waste, fraud, and abuse.<sup>2</sup> Q-Link is direct to consumer and uses no street agents to enroll subscribers. All Q-Link applicants complete online enrollment forms (frequently from public or work computers). Q-Link has passed 47 audits, with no duplicates or other findings of ineligible users, all while growing organically to serve 1.7 million consumers – 85% of whom were new-

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<sup>1</sup> Q-Link also provided the FCC attendees with a copy of the letter it sent to the Chairman and Commissioners addressing steps Q-Link has taken to assist its Lifeline subscribers affected by Hurricane Harvey. That letter has been separately filed in this docket, and thus is incorporated by reference. *See* Letter of Issa Asad, Chief Executive Officer, Q-Link Wireless, LLC to Chairman Pai and Commissioners Clyburn, O’Rielly, Carr, and Rosenworcel (filed September 6, 2017). Q-Link has since implemented the same relief for its Lifeline subscribers in Puerto Rico in the aftermath of Hurricane Irma.

<sup>2</sup> Letter of John T. Nakahata, Counsel to Q-Link Wireless, LLC, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 11-42 (filed August 10, 2017).

to-Lifeline. The irony is that by deciding not to include an API to support machine-to-machine enrollment via the service provider, USAC will break Q-Link's enrollment process. Instead, USAC will favor entities that use street agents (whom have been known to abuse the system and cause documented waste, fraud, and abuse) to help the consumer navigate the National Verifier's enrollment eligibility website, and then the Lifeline provider's enrollment process. This is a step backwards in fraud prevention.

Forcibly separating service providers from the initial process of consumers enrolling in the Lifeline program will harm both consumers and efficient administration of the Lifeline program. By not including an enrollment API, USAC will remove the critical support and infrastructure that service providers supply in helping consumers to assemble all of the documentation they need to verify identity, place of residence, and eligibility. To provide some understanding of the consumer interface task that USAC would then be assuming, Q-Link each day receives approximately 50,000 phone calls, 4,000 emails and 24,000 documents from applicants or prospective applicants (as distinguished from existing customers) as they go through the enrollment process. Q-Link must respond to each of those calls and emails, and review all documents submitted, in order to respond to potential customers' questions and to help them submit the information they need to submit to document their identity and eligibility for Lifeline. Across the major wireless Lifeline providers, the volume would likely be an order of magnitude higher. Moreover, it is likely that USAC will receive post-enrollment calls from consumers – or from consumers who were subsequently denied by a carrier – because some consumers will not recall who their provider is or will simply be confused. Q-Link receives a substantial number of calls every day from individuals who are customers of other carriers, but who are calling Q-Link because they are confused. There is no plausible way that USAC can duplicate all of the necessary support offered by service providers. Even attempting to do so will raise the costs of administering the National Verifier immensely, as USAC will have to develop a whole new infrastructure to handle consumer interactions around enrollment. Without the logistical support ETCs provide, Lifeline and the National Verifier will fail: as USAC itself told GAO, one of its identified challenges to successful launch, build, and operation of the National Verifier is “inadequate operational capacity to effectively manage new processes and high volumes of eligibility verifications.”<sup>3</sup> And most importantly, without such ETC support, consumers will be effectively denied access to Lifeline services, as they will become frustrated with navigating the USAC enrollment process and simply give up. This surely is not what the Commission seeks to achieve with the National Verifier implementation, but it will be the result if the Commission permits USAC to proceed as currently planned, without an API to allow consumers to enroll via a service provider.

Q-Link understands exactly what the National Verifier must do to successfully enroll consumers using online systems. Q-Link today runs such processes, including in states with state-eligibility databases. Low-income consumers often have many questions as they attempt to provide the information and documentation necessary, enter data with errors, fail to supply a

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<sup>3</sup> Government Accountability Office, *Additional Action Needed to Address Significant Risks in FCC's Lifeline Program*, GAO 17-538, at 51 (May 30, 2017).

complete address (such as missing apartment numbers), supply addresses in the wrong format, use nicknames, and supply the wrong or illegible documents. Illustratively, when Q-Link collects eligibility documentation today, it receives an average of 4-5 documents from each applicant, due to consumers supplying multiple copies, the wrong document or illegible copies. In some cases, consumers will provide original documents, such as a driver's license or social security card, which Q-Link must then take care to return. Consumers also start and stop, and then resume the enrollment process as they retrieve necessary documents. Q-Link runs processes to correct for all of these consumer errors and deficiencies, which allows consumers to stop, and then resume the application at the point they left off; with an API, USAC could leverage and benefit from all of Q-Link's work—as it does today with the NLAD—rather than having to duplicate that effort. Low income consumers need a way to transmit documents to the National Verifier. Q-Link today not only sends consumers a stamped, self-addressed envelope for sending copies of documents to Q-Link, but it has established relationships with services such as UPS to allow consumers to use fax machines at UPS Stores to send documentation, with the charges billed to Q-Link. In the Q-Link presentation from August 8<sup>th</sup>, slide 3 shows how this process works in states with state-eligibility databases today, and slide 8 shows how it could work with the National Verifier if USAC builds an API.<sup>4</sup> Notably, under the state process and the Q-Link/Industry proposed process with an API, the provider bears the burden of ensuring the collection of legible, properly formatted information. In addition, because every provider must also ensure that they are licensed, have coverage, and are an ETC in the area where the customer resides, the Q-Link/Industry process avoids burdening USAC with applications that the carrier will later have to deny – which would lead to further consumer confusion and calls to USAC. If USAC proceeds on its current course, it will have to prepare to answer millions of consumer calls per month from consumers attempting to navigate the National Verifier enrollment process, as well as calls from consumers who struggle to differentiate between USAC and the service provider.

We note that Q-Link is not advocating elimination of the option for USAC to perform all steps of interacting with the consumer to establish Lifeline eligibility. Some carriers, particularly small ETCs such as rural ILECs, may wish to turn all that interaction over to USAC in the manner contemplated by the current plans for the National Verifier. By creating the APIs discussed below for machine-to-machine interaction, the Commission and USAC can create the option (which would be used by the larger Lifeline providers) to interact with the consumer and package the consumer's enrollment for final consideration by the National Verifier, which would free up resources for USAC to use to interact with applicants on behalf of the smaller providers.

We understand that there is a desire for USAC to be able to verify the exact language to which a consumer certified, and to have a record of that certification. This can be done as part of the API. The Chairman has also directed USAC to register all Lifeline sales agents.<sup>5</sup> APIs can

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<sup>4</sup> Slide 8 shows multiple dips of the integrated NLAD and National Verifier. Only the dip at the bottom of the left hand column is for eligibility verification. This slide reflects Q-Link's process. Other providers may sequence this differently.

<sup>5</sup> Letter of Chairman Pai to Vickie Robinson, Acting Chief Executive Officer, USAC, at 4 (dated July 11, 2017).

be built to do this, and to collect additional information from providers to further enhance agent accountability and protections against fraud.

Accordingly, Q-Link puts forward a three-part solution to address all of these issues through automated machine-to-machine data exchanges between Lifeline ETCs and USAC via APIs. Q-Link has discussed this proposal with other major Lifeline providers and believes that this is a consensus proposal.

- **Stronger Agent/ETC Accountability: Establish a National Verifier (NV) Agent/ETC Registration Database to provide NV with visibility to Agent/ETC enrollment activity, with enhanced fraud detection capabilities.** Agent registration should include not just name and address, but also date-of-birth and Social Security Number. This will allow for USAC to perform automated identity verification on agents. ETCs would have to provide the agent identification number, geo-location (when available) and IP address for every verification request sent to the National Verifier. For applications completed online or applications completed without an agent, the ETC would provide USAC with geo-location (when available), and IP address. This additional data will help detect situations in which a registered agent passes his credentials on to other, unregistered agents.
- **USAC Control of Enrollment Disclosure/Acknowledgement/Certification language: Require that every applicant be presented with, and execute USAC controlled enrollment disclosure/acknowledgement/certification language in a manner that is controlled entirely by USAC.** This can be accomplished either through an automated process in which the ETC obtains the specific language from USAC for the applicant to review and sign (which may vary depending on the state), or USAC can require that a signed PDF of a standardized acknowledgement form be provided as part of the verification process.
- **Preserve the efficiency and consumer convenience of providers facilitating the collection and presentation of identity and eligibility verification through automated machine-to-machine (i.e. API) interaction.** The super majority of Lifeline enrollments are entirely API based today. Providers can help avoid unnecessary rejections by the NV for non-substantive issues or failure to provide the correct eligibility documentation when a customer cannot be verified because of limitation in the NV database. USAC identified the first five National Verifier states this week. All will require considerable manual review of eligibility documentation by the National Verifier because the state eligibility data is not comprehensive. Our proposed solution facilitates that effort for Applicants and USAC, ensuring that USAC receives legible copies of correct eligibility documents.

More detailed explanations of this proposal are contained in the attached presentations.

The proposed design takes into account the development effort needed to achieve FCC/USAC stated goals. It provides the necessary tools for Carriers to assist Applicants through

the enrollment process, and preserves the National Verifier's full authority to determine an applicant's Lifeline Eligibility. This recommendation fully leverages the existing NLAD/Carrier enrollment infrastructure. It consists of modifications to four existing API's and the creation of one new API.

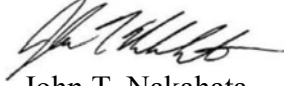
We believe these changes to NLAD can be made without materially affecting the current timeline for the rollout of the National Verifier. We estimate this recommendation will add minimal development and testing time to the FCC's current plan – likely less than 100 hours.

Q-Link is fully supportive of having a National Verifier, and will use the database, just as it uses the NLAD, to ensure that the consumers it serves are actually eligible for Lifeline, are bona fide, and are who they say they are. But it is critical that the database be built in a way that allows for efficient operation, which minimizes the operational burdens placed on USAC, and that does not confuse consumers or make it difficult for them to obtain Lifeline service. This can be done as a win-win-win process. The proposed changes will make that a reality.

Marlene H. Dortch  
September 8, 2017  
Page 6 of 6

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "John T. Nakahata".

John T. Nakahata  
*Counsel to Q-Link Wireless, LLC*

cc: Jay Schwarz  
Claude Aiken  
Travis Litman  
Amy Bender  
Nathan Eagan

Trent Harkrader  
Ryan Palmer  
Jodie Griffin  
Allison Baker

Attachments

# **Attachment A**

# NATIONAL VERIFIER IMPLEMENTATION

QLINK'S INDUSTRY SUPPORTED PROPOSAL FOR  
NATIONAL VERIFIER ENROLLMENT PROCESS

QLINK MEETINGS WITH FCC – 9/6/17



## ***PROPOSAL DESIGNED TO ACHIEVE THREE GOALS***

- I. Agent/ETC Accountability: Establish a National Verifier (NV) Agent/ETC Registration Database to provide NV with visibility to Agent/ETC enrollment activity.
- II. USAC Control of Enrollment language: require that every applicant be presented with, and execute USAC controlled enrollment form language in a manner that is controlled entirely by USAC.
- III. Preserve the efficiency and consumer convenience of providers facilitating the collection and presentation of identity and eligibility verification through automated machine-to-machine (i.e. API) interaction. The super majority of Lifeline enrollments are entirely API based today. Providers can help avoid unnecessary rejections by the NV for non-substantive issues or failure to provide the correct eligibility documentation when a customer cannot be verified because of limitations in the NV database.

***I. ESTABLISH A NATIONAL VERIFIER (NV) AGENT/ETC REGISTRATION DATABASE TO DRIVE AGENT/ETC ACCOUNTABILITY AND PROVIDE NV WITH VISIBILITY TO AGENT/ETC ENROLLMENT ACTIVITY.***

- All Agents/ETCs must register and provide proof of name, address, DOB and full SSN. All registered agents will receive a unique NV Agent ID. This fulfills the registration requirement of Chairman Pai's July 11, 2017 letter to USAC.
- Every enrollment attempt started by an Agent must be stamped with their NV Agent ID, IP address, and geo-location (when available).
- Every interaction between Agent and NV must include NV Agent ID, IP address and geo-location (when available).
- The industry was making plans to do this but USAC is a better place for it to reside.

## ***II. REQUIRE THAT EVERY APPLICANT BE PRESENTED WITH, AND EXECUTE USAC CONTROLLED ENROLLMENT FORM LANGUAGE IN A MANNER THAT IS CONTROLLED ENTIRELY BY USAC.***

- This will be achieved via a new, required, third API call to NV that takes place between the existing Verify Call and the existing Enroll Call. Let's name the new API call the "Lifeline Application Call".
- NV will establish a unique Lifeline Applicant ID for each applicant that makes a Verify Call to NLAD, and will include the new Lifeline Applicant ID in NV's response to each Verify Call.
- After receipt of Verify Call Response from NV, Service Provider will make a new API call, the Lifeline Application Call to NV, which will request the latest USAC-approved Lifeline enrollment form language (Disclosures, Attestation, Certifications, etc.). Service Provider will include the applicant's new Lifeline Applicant ID in the API call so that NV can respond with enrollment form language that is state-specific and applicant-specific (port freeze override scenario, etc.).

III. Preserve the efficiency and consumer convenience of providers facilitating the collection and presentation of identity and eligibility verification through automated machine-to-machine (i.e. API) interaction.

- Will require ETC to make at least three dips to NV platform to complete a successful enrollment.
- Will meet all 2016 Order requirements including providing ETCs the ability to establish and determine subscriber eligibility.
- Will prevent applicants from having to enter their PII information multiple times and thus avoid data-entry miscues. It will also allow providers to ensure application information is presented in the correct form (e.g. USPS). Will also prevent applicant from having to jump to multiple websites to complete an enrollment.
- Will provide one seamless enrollment decision to applicant, avoiding the confusion associated with tens of thousands of applicants each month receiving Service Provider denials after NV approval (e.g. from lack of coverage or ETC authorization in the state).

## **II. CONTINUED...**

- Service Provider must present the specific enrollment form language received from the NV Lifeline Application Call to applicant for execution. Service Provider must then include proof of executed USAC-approved language in the Enroll Call API data sent to NV to complete the enrollment attempt. NV can determine what form it would like this confirmation to take, either a time and date stamped record, or a full PDF of the executed enrollment form.
- This process will ensure that USAC/NV has complete control over the language employed in every Lifeline enrollment. It will also provide the enrollment form language guidance that the industry has been requesting for years and relieve the industry's frustrations at having to guess at, or pay considerable attorneys' fees to determine compliant language. Improper enrollment form language, historically, is not waste, fraud or abuse. It's simply a lack of guidance.

# PROPOSED NATIONAL VERIFIER ENROLLMENT WORKFLOW



## ***USAC DEVELOPMENT REQUIRED TO IMPLEMENT OUR RECOMMENDATION***

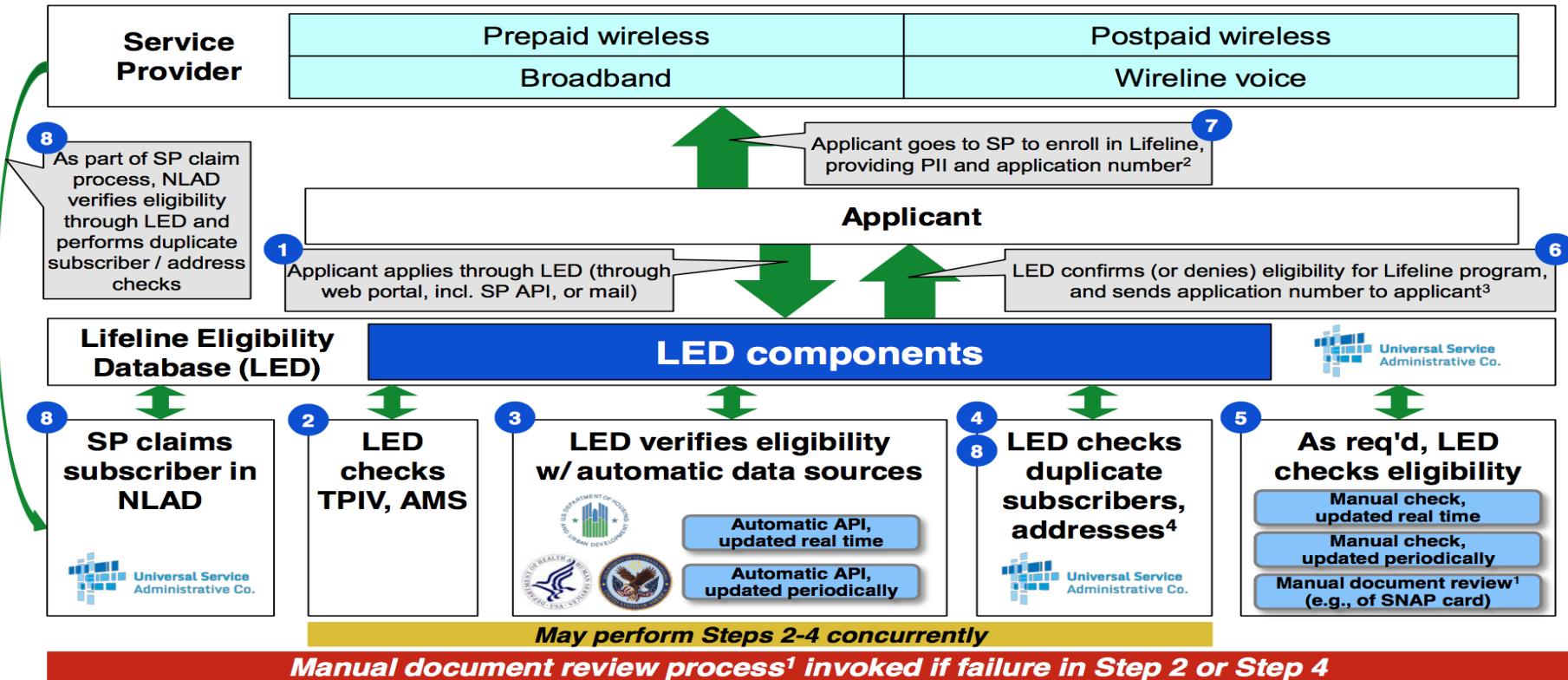
- Our proposed design has taken into account the development effort needed to achieve FCC/USAC stated goals. It provides the necessary tools for Carriers to assist Applicants through the enrollment process, and preserves the National Verifier's full authority to determine an applicant's Lifeline Eligibility.
- This recommendation fully leverages the existing NLAD/Carrier enrollment infrastructure. It consists of modifications to four existing API's and the creation of one new API.
- We believe these changes to NLAD can be made without impacting the current timeline for the rollout of the National Verifier and have Logged a Call to James Lee, of USAC, to discuss. We estimate this recommendation will add minimal development and testing time to the FCC's current plan.
- USAC identified the first five National Verifier states this week. All will require considerable manual review of eligibility documentation by the National Verifier because the state eligibility data is not comprehensive. Our proposed solution facilitates that effort for Applicants and USAC, ensuring that USAC receives legible copies of correct eligibility documents.

# NATIONAL VERIFIER PUBLISHED SCHEMATIC

② Business architecture ① Individual application

UPDATED

**Consumer verifies eligibility directly through NV (including through API provided to SPs); SPs enroll verified applicants**



Note: Number balls represent steps in process; all actions on step 8 happen simultaneously 1. Eligibility and/or identity verified through document review at the USAC call center as failsafe process of last resort 2. Application number can be recovered online with applicant PII, as well as through the NV consumer call center 3. Eligibility determinations remain valid for 90 days 4. SPs are permitted to help applicants resolve failed duplicate checks through the NV (e.g. by assisting the consumer to fill out an IEH form in the NV system), in compliance with the Lifeline program rules, as well as NV guidelines to be issued by USAC.



## ***USAC'S PROPOSED SOLUTION DOES NOT MEET FCC MANDATES***

- Does not “provide Lifeline Providers access to establish eligibility” for applicants.
- Does not “provide varying interfaces methods to accommodate” Lifeline providers.
- Does not provide “interfaces that promote the objectives of the National Verifier and service the needs of (99%) of users in a cost effective and efficient manner.”
- Does not “provide cost effective and administratively efficient ways to populate the LED”.
- Does not “have another interface geared toward providers that may allow application programming interfaces (machine-to-machine interaction).”

## ***USAC PROPOSED SOLUTION INTRODUCES HARDSHIPS/INEFFICIENCIES TO ENROLLMENT PROCESS***

- USAC Model is needlessly burdensome to Consumer Applicants
  - Will require Applicant to enter their PII data multiple times in the enrollment process.
  - Will introduce data re-entry errors to the enrollment process where none exist today, as Applicants will be forced to jump between multiple websites to complete enrollment.
  - Will introduce significant confusion to the enrollment process by presenting two separate approval decisions, where one exists today. Tens of thousands of applicant each month will be approved by the National Verifier, then denied by the carrier for reasons such as:
    - Advanced carrier duplicate prevention measures
    - Lack of carrier coverage
    - Address is outside of State-approved footprint
    - Additional program Integrity checks

# **Attachment B**

# Improving the Fraud Detection and Efficiency of the National Verifier While Making the Process More Consumer-Friendly An API Based Model

**Proposal Designed to Achieve Three Goals:**

***I. Agent/ETC Accountability: Establish a National Verifier (NV) Agent/ETC Registration Database to provide NV with visibility to Agent/ETC enrollment activity, with enhanced fraud detection capabilities.***

***II. USAC Control of Enrollment Disclosure/Acknowledgement/Certification language: Require that every applicant be presented with, and execute USAC controlled enrollment disclosure/acknowledgement/certification language in a manner that is controlled entirely by USAC.***

***III. Preserve the efficiency and consumer convenience of providers facilitating the collection and presentation of identity and eligibility verification through automated machine-to-machine (i.e. API) interaction. The super majority of Lifeline enrollments are entirely API based today. Providers can help avoid unnecessary rejections by the NV for non-substantive issues or failure to provide the correct eligibility documentation when a customer cannot be verified because of limitation in the NV database.***



## Agent and ETC Registration

- Sales Agents must pre-register directly with the National Verifier and be issued a National Verifier Agent ID.
  - Agents must submit name, address, date of birth and Social Security Number.
- ETCs must also be pre-registered with the National Verifier

## NV Provider Interactions -- Option 1

### 1. National Verifier/NLAD Verify Call

- NV performs all of the current necessary checks including:
  - Third Party ID Validation (TPIV)
  - IEH Check
  - Address Verification
  - Duplicate Check
- Add new National Verifier check/response that will indicate:
  - Applicant Pre-Qualified
    - Applicant Pre-Qualified Last 30 Days – Applicant’s eligibility and Lifeline Application has previously been approved by the National Verifier and is ready to enroll. In this workflow, the Applicant will not be required to complete the National Verifier Lifeline Acknowledgements and Certifications as it was previously done directly with the National Verifier.
    - Applicant Pre-Qualified Real-Time – Perform real-time check into one of the USAC accessible Federal or State databases to confirm applicant’s participation in a qualifying program.
  - Applicant Not Found – Notifies the Carrier the Applicant was not found in one of the available eligibility databases. If the Applicant is able to document his participation in one of the qualifying programs then the Carrier may collect the documentation for submission to the National Verifier for manual review.
- Channel Tracking
  - The National Verifier Agent ID (mandatory if the enrollment is done by a Sales Agent) must be electronically transmitted to the National Verifier/NLAD with every Verify call initiated by the Carrier, with the geolocation (when available) and IP address.
  - For online applications or applications performed without the assistance of a Sales Agent the National Verifier Agent ID will not be required and geo-location (if available) and IP address must be provided.
  - Transmission of the Applicant facing IP address for each enrollment and the geo-location of the enrollment (if available), will be included with every Verify call.
- NLAD Applicant ID – NV returns the NLAD Application ID that will be used along with all subsequent NV API transactions. In the event that Applicant needs to be re-checked

(to retry database checks, or for updating data in the API call), the previously issued NLAD Applicant ID must be included with any subsequent Verify calls.

2. National Verifier/NLAD Lifeline disclosures/acknowledgements, certifications
  - Deliver new API that FCC/USAC/National Verifier will provide to Carriers for the uniform content and acceptance of the disclosures, acknowledgement and certifications to Applicants across all Carriers passing the NLAD Applicant ID for each application/applicant.
    - NLAD Applicant ID – Carrier will provide the NLAD Applicant ID to be used by USAC for tracking back to the originating Verify call.
3. National Verifier/NLAD Enroll/Transfer Call
  - NLAD Applicant ID – Carrier will pass the NLAD Applicant ID and USAC will enroll the subscriber based on the data retained from the Verify call and associated with the NLAD Applicant ID.
4. National Verifier/NLAD Resolution Call
  - NLAD Applicant ID – Carrier will pass the NLAD Applicant ID and USAC will create a Resolution Request for the Applicant based on the data retained from the Verify call and associated with the NLAD Applicant ID.
  - Add new field/functionality to support the transmission of necessary documents needed by the National Verifier to verify the Subscriber's eligibility. This can include qualifying program proof, income proof, address proof, ID proof, etc.
5. National Verifier/NLAD Call Back
  - Develop a standard Call Back method to be used by the National Verifier that will push the decision to the Carrier after application has been reviewed by National Verifier.
6. National Verifier/NLAD Applicant ID
  - Provide an API based solution for the Carrier to query using the NLAD Applicant ID to verify status of the Application.
7. National Verifier/NLAD Applicant ID
  - After Successful Enrollment, the NLAD Applicant ID will become the NLAD Subscriber ID.

## NV Provider Interactions – Option 2

1. National Verifier/NLAD Verify Call

- NV performs all of the current necessary checks including:
  - Third Party ID Validation (TPIV)
  - IEH Check
  - Address Verification
  - Duplicate Check
- Add new National Verifier check/response that will indicate:
  - Applicant Pre-Qualified
    - Applicant Pre-Qualified Last 30 Days – Applicant’s eligibility and Lifeline Application has previously been approved by the National Verifier and is ready to enroll. In this workflow, the Applicant will not be required to complete the National Verifier Lifeline Acknowledgements and Certifications as it was previously done directly with the National Verifier.
    - Applicant Pre-Qualified Real-Time – Perform real-time check into one of the USAC accessible Federal or State databases to confirm applicant’s participation in a qualifying program.
  - Applicant Not Found – Notifies the Carrier the Applicant was not found in one of the available eligibility databases. If the Applicant is able to document his participation in one of the qualifying programs then the Carrier may collect the documentation for submission to the National Verifier for manual review.
- Channel Tracking
  - The National Verifier Agent ID (mandatory if the enrollment is done by a Sales Agent) must be electronically transmitted to the National Verifier/NLAD with every Verify call initiated by the Carrier with the geo-location (when available) and IP address.
  - For online applications or applications performed without the assistance of a Sales Agent, the National Verifier Agent ID will not be required and geo-location (when available) and IP address must be provided.
  - Transmission of the Applicant facing IP address for each enrollment and the geo-location (when available) of the enrollment (if available), will be included with every Verify call.
- NLAD Applicant ID – Return the NLAD Application ID that will be used along with all subsequent API transactions. In the event that Applicant needs to be re-checked the previously issued NLAD Applicant ID will be included with any subsequent Verify calls.

## 2. National Verifier/NLAD Enroll/Transfer Call

- NLAD Applicant ID – Carrier will pass the NLAD Applicant ID and USAC will enroll the subscriber based on the data retained from the Verify call and associated with the NLAD Applicant ID.
- National Verifier Lifeline Application – Submission via the same API of a completed USAC designed Lifeline Disclosures/Acknowledgments/Certifications PDF Template with specific customer information filled in as provided by the applicant.

## 3. National Verifier/NLAD Resolution Call

- NLAD Applicant ID – Carrier will pass the NLAD Applicant ID and USAC will create a Resolution Request for the Applicant based on the data retained from the Verify call and associated with the NLAD Applicant ID.
  - Add new field/functionality to support the transmission of necessary documents needed by the National Verifier to verify the Subscriber's eligibility. This can include qualifying program proof, income proof, address proof, ID proof, etc.
  - National Verifier Lifeline Disclosures/Acknowledgments/Certifications – Submission via the same API of a completed USAC designed Lifeline Disclosures/Acknowledgments/Certifications PDF Template with specific customer information filled in as provided by the applicant.
4. National Verifier/NLAD Call Back
    - Develop a standard Call Back method to be used by the National Verifier that will push the decision to the Carrier after application has been reviewed by National Verifier.
  5. National Verifier/NLAD Applicant ID
    - Provide an API based solution for the Carrier to query using the NLAD Applicant ID to verify status of the Application.
  6. National Verifier/NLAD Applicant ID
    - After Successful Enrollment, the NLAD Applicant ID will become the NLAD Subscriber ID.